

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

IN RE:

BNP PETROLEUM CORPORATION,	§	CASE NO. 09-20206
AND BNP OIL & GAS PROPERTIES,	§	CASE NO. 09-20612
LTD.	§	(Chapter 11)
DEBTORS.	§	JOINTLY ADMINISTERED UNDER
	§	CASE NO. 09-20206

TOBY SHOR and SEASHORE
INVESTMENTS MANAGEMENT
TRUST,

Plaintiffs

V.

ADVERSARY NO. _____

PAUL BLACK; BNP HOLDILNGS,
LDT.; BNP OIL & GAS PROPERTIES,
LDT.; BNP PETROLEUM
CORPORATION; PBF INVESTMENTS,
LTD.; PAGENERGY COMPANY, L.L.C.;
TSE EQUITIES I, L.L.C.; TSE
EQUITIES COMPANY, LTD.; BNP
MANAGEMENT L.L.C.; 500 WATER
STREET PROPERTY, L.L.C.; AND 500
N. WATER STREET PROPERTY I, L.L.C.
Defendant

NOTICE OF REMOVAL

TO THE U.S. BANKRUPTCY CLERK:

Please take notice that Michael B. Schmidt, Trustee, ("Trustee") for the Bankruptcy Estates of BNP Petroleum Corporation and BNP Oil & Gas Properties, Ltd, by and through his attorney, hereby removes to this Court the State Court action described below:

1. A Petition was filed in the County Court at Law No. One, Nueces County, Texas under Cause No. 08-60699 styled *Toby Shor and Seashore Investments Management Trust v. Paul Black; BNP Holdings, Ltd.; BNP Oil & Gas Properties, Ltd.; BNP Commercial Properties, Ltd.; BNP Petroleum Corporation; PBF Investments, Ltd.; Pagenergy Company, L.L.C.; TSE Equities I, L.L.C.; TSE Equities Company, Ltd.; BNP Management, L.L.C. ; 500 N. Water Street Property I, L.L.C.* (the "State Court Action"). The Bankruptcy Estate's are Defendants in the State Court Action. A complete copy of the file in the action will be filed as soon as reasonably

possible.

2. BNP Petroleum Corporation and BNP Oil & Gas Properties, Ltd, as Debtors in bankruptcy filed for relief under the Bankruptcy Code subsequent to the filing of the State Court Action.

3. This Notice is filed timely in the State Court Action in accordance with Rule 9027 Fed. R. Bank. Proc.

4. This action is a core proceeding pursuant to 28 U.S.C. §157 (b)(2)(A)(B), (C), (E), (L) and (O). Therefore, this action is one which may be removed pursuant to 28 U.S.C. §1452 and/or Federal Bankruptcy Rule 9027.

5. Parties: Pursuant to Local :Rule 9027 (a), the following is a list of the names and addresses of all parties, on which service has been accomplished, and the name, address and telephone number of the counsel for each party.

Plaintiff: Toby Shor and Seashore Investments Management Trust,
Counsel: Reynolds, Frizzell, Black, Doyle, Allen & Oldham, LLP
1100 Louisiana, Suite 3500
Houston, TX 77002
713-485-7200

Gibbs & Bruns, LLP
1100 Louisiana, Suite 5300
Houston, TX 77002
713-650-8805

King & Spalding, LLP
1100 Louisiana, Suite 4000
Houston, TX 77002
713-751-3200

Service by serving Plaintiffs' Counsel.

Defendant (other than Bankruptcy Debtors): Paul Black; BNP Holdings, Ltd.; BNP Commercial Properties, Ltd.; BNP Petroleum Corporation; PBF Investments, Ltd.; Pagenergy Company, L.L.C.; TSE Equities I, L.L.C.; TSE Equities Company, Ltd.; BNP Management, L.L.C. ; 500 N. Water Street Property I, L.L.C.

Counsel:

Watts Guerra Craft, LLP
300 Convent, Suite 100
San Antonio, TX 78205
210-527-0500

Harris & Greenwell
615 N. Upper Broadway, Ste 1700
Corpus Christi, TX 78477
361-883-1961

WHEREFORE, Trustee herby gives notice that this action is removed to this Court and requests that this action be placed on the docket of this Court for further proceedings, the same as though this action had been initiated originally in this Court, and for such other and further relief entitled to.

Dated: November 15, 2010

Respectfully submitted:
Law Office of Michael B. Schmidt

By: /S/KEVIN HANNA
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Fed. ID No. 10260 / 17125
ATTORNEYS FOR CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the above and foregoing legal document was electronically mailed this 15th day of November, 2010 to those on the attached list and to those listed below.

/S/KEVIN HANNA
Kevin P. Hanna

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